

Exhibit H

Morgan Lewis

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October 10, 2022

VIA EMAIL

Edward P. Sullivan, Special Assistant U.S. Attorney
Heidi B. Gesch, Assistant U.S. Attorney
United States Attorney's Office
for the Eastern District of Virginia
Justin W. Williams United States Attorney's Building
2100 Jamieson Avenue
Alexandria, VA 22314

Re: United States v. Julio R. Sotomayor, 1:22-cr-00122-RDA-1

Dear Ed and Heidi:

This letter addresses certain requests based on our preliminary review of the third production of discovery materials. We have received the audio files that are associated with the government's interviews and other interactions with Juan Arevalo, Crystal Digiovacchino, Laura Hineman, John Ballentine, and Robert Sturgis. These audio files were located in the "Native – Manually Placeholderd" folder in Part 3 of the production. The production does not, however, include any transcripts of the interviews and interactions with Juan Arevalo, John Ballentine or Robert Sturgis. We ask that you either confirm that no such transcripts exist or provide the transcripts of these and any outstanding recorded interviews as soon as possible.

Further, the third production does not include any additional grand jury testimony. While we explicitly requested that all grand jury testimony be provided as quickly as possible in our August 22 letter, documents in the third production make clear that significant testimony has still been withheld. Indeed, Robert Sturgis was interviewed "in preparation for Grand Jury Testimony" on May 18, 2022. *See* FBI-00060421. Diane Sturgis was also interviewed again on April 22, 2022, presumably, in preparation for testimony before the Grand Jury. *See* FBI-00060355. We renew and reiterate our request from August 22 that you produce all remaining grand jury testimony immediately in order to allow us to provide effective assistance of counsel to our client.

Your office should have received another external hard drive for the fourth production as well as the materials requested in our October 4 letter. If you have any questions, please do not hesitate to contact me.

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Sincerely,

A handwritten signature in black ink, appearing to read "John J. Pease III", with a long horizontal flourish extending to the right.

John J. Pease III

cc: Jonathan York, Esq.